

# **EXHIBIT B**

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

CHASOM BROWN, WILLIAM BYATT,  
JEREMY DAVIS, CHRISTOPHER  
CASTILLO, and MONIQUE TRUJILLO  
individually and on behalf of all other  
similarly situated,

### **Plaintiffs.**

Case No.: 5:20-cv-03664-LHK-SVK

vs.  
GOOGLE LLC,  
Defendant.

## [PROPOSED] ORDER

Before the Court is Plaintiffs' Dispute 6 from the April 23, 2021 Joint Letter Brief ("Plaintiffs' Dispute 6"). Having considered Plaintiffs' Dispute 6, the papers on file, argument at the April 29, 2021 hearing, and good cause having been shown, the Court **ORDERS** as follows:

By May 10, 2021, Google will produce documents responsive to Plaintiffs' Request for Production No. 10 as follows:

1. Data regarding Google's collection of the X-Client-Data header, including browsing data where there is no X-Client-Data header; and
  2. Data tied to the cookies described in Plaintiffs' submission to this Court for Dispute 6.

This relief will not prevent or otherwise exclude Plaintiffs from seeking further relief related to Request for Production No. 10 upon a showing of good cause.

## IT IS SO ORDERED.

DATED:

Honorable Susan van Keulen  
United States Magistrate Judge

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16 *Attorneys for Defendant Google LLC*

17 UNITED STATES DISTRICT COURT

18 NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

20 CHASOM BROWN, WILLIAM BYATT,  
21 JEREMY DAVIS, CHRISTOPHER  
22 CASTILLO, and MONIQUE TRUJILLO,  
individually and on behalf of all similarly  
situated,

Case No. 5:20-cv-03664-LHK-SVK

23 Plaintiffs,

**[GOOGLE PROPOSED] ORDER  
DENYING PLAINTIFFS' REQUEST TO  
COMPEL ADDITIONAL DOCUMENTS  
RELATED TO CLASS MEMBER  
IDENTIFICATION (RFP NO. 10)**

24 v.

Referral: Hon. Susan van Keulen, USMJ

25 GOOGLE LLC,

26 Defendant.

1 [GOOGLE PROPOSED] ORDER  
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3 Before the Court is Plaintiffs' Request to Compel Additional Documents Related to Class  
4 Member Identification (RFP No. 10) ("Plaintiffs' Request to Compel"). Having considered the  
5 parties' papers filed in support and in opposition to Plaintiffs' Request to Compel, the Court hereby  
6 **DENIES** Plaintiffs' Request to Compel.

7 **THEREFORE, IT IS ORDERED** that Plaintiffs' Request to Compel is **DENIED**.

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9 **IT IS SO ORDERED.**

10 DATED: \_\_\_\_\_

11 HON. SUSAN VAN KEULEN  
12 United States Magistrate Judge  
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